

No. 21-2348

**United States Court of Appeals
for the Federal Circuit**

LKQ CORPORATION, KEYSTONE AUTOMOTIVE INDUSTRIES, INC.,

Appellants,

v.

GM GLOBAL TECHNOLOGY OPERATIONS LLC,

Appellee.

ON APPEAL FROM THE UNITED STATES PATENT AND TRADEMARK OFFICE,
PATENT TRIAL AND APPEAL BOARD IN INTER PARTES REVIEW NO.
IPR2020-00534

**APPELLEE’S UNOPPOSED MOTION FOR LEAVE
TO APPEAR AS COUNSEL**

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*Attorneys for Appellee
GM Global Technology Operations LLC*

Dated: August 29, 2023

NOW COMES GM Global Technology Operations LLC (“GM”), and in accordance with Federal Circuit Rule 47.3(b)(4) respectfully requests this Court grant it leave to allow Sarah E. Jack to appear as counsel for GM in the above-captioned matter.

On August 28, 2023, GM’s counsel notified counsel for LKQ Corporation and Keystone Automotive Industries, Inc. (collectively “LKQ”) of GM’s intent to file this motion, and LKQ’s counsel indicated LKQ had no objection.

WHEREFORE, for the reasons set forth above, GM respectfully requests that this Court grant it leave to allow Sarah E. Jack to appear in the above-captioned matter.

Dated: August 29, 2023

Respectfully submitted,

/s/ Joseph A. Herriges

Joseph A. Herriges

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*Attorneys for Appellee GM Global
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FORM 19. Certificate of Compliance with Type-Volume Limitations

Form 19
July 2020

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITATIONS

Case Number: 21-2348

Short Case Caption: LKQ Corporation v. GM Global Technology Operations LLC

Instructions: When computing a word, line, or page count, you may exclude any items listed as exempted under Fed. R. App. P. 5(c), Fed. R. App. P. 21(d), Fed. R. App. P. 27(d)(2), Fed. R. App. P. 32(f), or Fed. Cir. R. 32(b)(2).

The foregoing filing complies with the relevant type-volume limitation of the Federal Rules of Appellate Procedure and Federal Circuit Rules because it meets one of the following:

- ☒ the filing has been prepared using a proportionally-spaced typeface and includes 98 words.
- ☐ the filing has been prepared using a monospaced typeface and includes _____ lines of text.
- ☐ the filing contains _____ pages / _____ words / _____ lines of text, which does not exceed the maximum authorized by this court's order (ECF No. _____).

Date: 08/29/2023

Signature: /s/ Joseph A. Herriges

Name: Joseph A. Herriges

FORM 9. Certificate of Interest

Form 9 (p. 1)
March 2023

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CERTIFICATE OF INTEREST

Case Number 21-2348
Short Case Caption LKQ Corporation v. GM Global Technology Operations LLC
Filing Party/Entity GM Global Technology Operations LLC

Instructions:

1. Complete each section of the form and select none or N/A if appropriate.
2. Please enter only one item per box; attach additional pages as needed, and check the box to indicate such pages are attached.
3. In answering Sections 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance.
4. Please do not duplicate entries within Section 5.
5. Counsel must file an amended Certificate of Interest within seven days after any information on this form changes. Fed. Cir. R. 47.4(c).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: 08/29/2023

Signature: /s/ Joseph A. Herriges

Name: Joseph A. Herriges

FORM 9. Certificate of Interest

Form 9 (p. 2)
March 2023

1. Represented Entities. Fed. Cir. R. 47.4(a)(1).	2. Real Party in Interest. Fed. Cir. R. 47.4(a)(2).	3. Parent Corporations and Stockholders. Fed. Cir. R. 47.4(a)(3).
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities. <input checked="" type="checkbox"/> None/Not Applicable	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities. <input type="checkbox"/> None/Not Applicable
GM Global Technology Operations LLC		General Motors Company

☐ Additional pages attached

FORM 9. Certificate of Interest

Form 9 (p. 3)
March 2023

4. Legal Representatives. List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this court for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).

☐ None/Not Applicable☐ Additional pages attached

Dorothy P. Whelan	Craig Deutsch	Grace Kim
Jennifer Huang	Fish & Richardson P.C.	

5. Related Cases. Other than the originating case(s) for this case, are there related or prior cases that meet the criteria under Fed. Cir. R. 47.5(a)?

☐ Yes (file separate notice; see below) ☒ No ☐ N/A (amicus/movant)

If yes, concurrently file a separate Notice of Related Case Information that complies with Fed. Cir. R. 47.5(b). **Please do not duplicate information.** This separate Notice must only be filed with the first Certificate of Interest or, subsequently, if information changes during the pendency of the appeal. Fed. Cir. R. 47.5(b).

6. Organizational Victims and Bankruptcy Cases. Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).

☒ None/Not Applicable☐ Additional pages attached

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

ENTRY OF APPEARANCE

Case Number: 21-2348

Short Case Caption: LKQ Corporation v. GM Global Technology Operations LLC

Instructions: Refer to Fed. Cir. R. 47.3 for requirements governing representation and appearance in this court. Counsel must immediately file an amended Entry of Appearance if contact information changes and update information through PACER's [Manage My Account](#). Non-admitted government counsel should enter N/A in lieu of an admission date. Use the second page to add additional counsel.

Party Information. List all parties, intervenors, amicus curiae, or movants represented by below counsel; "et al." is not permitted.

GM Global Technology Operations LLC

Principal Counsel: Joseph A. Herriges

Admission Date: 04/22/2016

Firm/Agency/Org.: Fish & Richardson P.C.

Address:

60 South 6th Street, Suite 3200, Minneapolis, MN 55402

Phone: 612-335-5070

Email: herriges@fr.com

Other Counsel: Nitika Gupta Fiorella

Admission Date: 08/03/2016

Firm/Agency/Org.: Fish & Richardson P.C.

Address:

222 Delaware Avenue, 17th Floor, Wilmington, DE 19801

Phone: 302-652-5070

Email: fiorella@fr.com

I certify under penalty of perjury that (1) the submitted information is true and accurate and (2) I am authorized to enter an appearance by all other listed counsel.

Date: 8/29/23

Signature: /s/ Joseph A. Herriges

Name: Joseph A. Herriges

FORM 8A. Entry of Appearance

Form 8A (p.2)
July 2020**[DO NOT SUBMIT THIS PAGE IF IT IS BLANK.]**

Other Counsel: John A. Dragseth		Admission Date: 08/07/1998
Firm/Agency/Org.: Fish & Richardson P.C.		
Address: 60 South 6th Street, Suite 3200, Minneapolis, MN 55402		
Phone: 612-335-5070	Email: dragseth@fr.com	
Other Counsel: Sarah E. Jack		Admission Date: 09/03/2020
Firm/Agency/Org.: Fish & Richardson P.C.		
Address: 60 South 6th Street, Suite 3200, Minneapolis, MN 55402		
Phone: 612-335-5070	Email: jack@fr.com	
Other Counsel:		Admission Date:
Firm/Agency/Org.:		
Address:		
Phone:	Email:	
Other Counsel:		Admission Date:
Firm/Agency/Org.:		
Address:		
Phone:	Email:	
Other Counsel:		Admission Date:
Firm/Agency/Org.:		
Address:		
Phone:	Email:	